

REMARKS

This Application has been carefully reviewed in light of the final Office Action electronically sent January 2, 2009. Claims 8-14 and 54-99 were pending in the Application (Claims 75-99 have not yet been withdrawn, but are not under consideration in light of Applicants election). Claims 8-13 and 54-72 are rejected, Claim 14 is allowed, and Claims 73 and 74 are objected to in the Office Action.

Section 101 Rejections

The Examiner rejects Claims 59 and 66 under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. Although not clear, it appears that the Office Action is contending that the term “executing” can only be used when claiming a computer readable medium storing programming instructions. The Office Action provides no support or explanation for this assertion. Claims 59 and 66 are statutory method and system claims, respectively, that recite what the composite registration information claimed in Claims 54 and 61 comprises. In particular, this composite registration information includes a process identification string that identifies a device process that is executing in the call manager. These claims do not recite the device process itself, they simply claim an identification string that identifies such a device process. This is clearly statutory. For at this least reason, Applicants respectfully request reconsideration and allowance of Claims 59 and 66.

Section 112 Rejections

The Examiner rejects Claims 54, 57, 61 and 64 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter of which applicant regards as the invention.

Regarding Claims 54 and 61, “a change in which call manager of the plurality of call managers controls a device” refers to any of the recited plurality of call managers. Thus, the call manager controlling the device could be the recited first call manager, the recited second call manager, or any other call managers (if the recited “plurality of call

managers” includes call managers in addition to the first and second call managers). Applicants thus respectfully request reconsideration and allowance of these claims.

Regarding Claims 57 and 64, Applicants do not understand the substance of this rejection and respectfully request that the Examiner clarify the rejection. In any case, Applicants contend that these claims comply with Section 112.

Section 103 Rejections

The Office Action rejects Claims 8-13, 54-56, 58-63, and 65-72 under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 6,671,262 issued to Kung et al. (“*Kung*”).

Independent Claim 8 of the present application recites the following limitations:

A method for device registration replication, comprising:
providing a plurality of call managers in a packet-based network, each call manager controlling one or more devices coupled to the packet-based network and storing composite registration information associated with the devices controlled by the plurality of call managers;
determining that a first call manager has gone off-line; and
deleting registration information associated with the first call manager from the composite registration information stored by a second call manager.

Claim 8 is allowable because *Kung* does not disclose, teach or suggest each and every one of these limitations. For example, *Kung* does not disclose a plurality of call managers that each store “composite registration information associated with the devices controlled by the plurality of call managers.” *Kung* does not disclose that a call manager stores *composite* registration information about devices controlled by a plurality of call managers (i.e., which necessarily includes registration information about devices controlled by other call managers). The Office Action asserts that this limitation is disclosed at Column 10, lines 25-35 and 55-65 of *Kung*, which the Office Action characterizes as disclosing that the “call manager includes a storage listing number of subscribers, verifies identity of the calling subscribers and authenticates whether a call is authorized.” This is not a disclosure of a call manager that stores *composite* registration information about devices controlled by a plurality of other call managers.

Furthermore, *Kung* does not disclose “determining that a first call manager has gone off-line; and deleting registration information associated with the first call manager from the composite registration information stored by a second call manager.” The present Office Action asserts that these limitations of Claim 1 are disclosed by a teaching in *Kung* that a call manager determines that it needs resources for a call and communicates with other call managers requesting available resources for the call. Although step 1315 of Figure 13 of *Kung* discloses communications between call managers, there is no disclosure that any such communications are in response to a change in which call manager of the plurality of call managers controls a device (such as a call manager going off-line). Furthermore, there is no disclosure that such communications are for the purposes of changing (e.g., causing the deletion of) any registration information.

Moreover, the Examiner goes on to assert that deleting existing subscribers or adding new subscribers is inherent given the fact that *Kung* discloses updating registration information. However, Applicants believe this inherency argument is moot given the fact that *Kung* does not disclose updating (or even storing) composite registration information, as discussed above. Furthermore, the paragraph asserting inherency also mentions *Kung* alleged teaching of “updat[ing] the new calling subscribers to the conference call.” Applicants are unsure to what the Examiner is referring and how it relates to storing composite registration information as claimed. *Kung* merely discloses finding a resource for a call (CS) and then initiating the call using that resource. This is not a teaching of updating composite registration information as claimed.

For at least these reasons, Applicants respectfully submit that Claim 8 is in condition for allowance. Therefore, Applicants request reconsideration and allowance of Claim 8, as well as Claim 9, which depends from Claim 8.

In addition to its dependence from allowable Claim 8, Claim 9 is also allowable since *Kung* does not disclose the additional limitations recited in this dependent claim. For example, Claim 9 recites “wherein determining that a first call manager has gone off-line comprises . . . failing to receive a response from the first call manager, the first call manager having previously responded to a polling message from the second call manager.” For a

teaching of this limitation, the Office Action points to steps 1315 and 1317 of Figure 13 of *Kung*. However, the “NO” branch referenced by the Examiner is referring to an indication from other call managers that there are no resources available for a call. This would be the opposite of failing to receive a response from a call manager since the call manager responded to indicate that no resources are available. For at least this additional reason, Claim 9 is allowable.

Furthermore, although the specific limitations of independent Claim 10 are again not addressed, Claim 10 is allowable at least for reasons similar to those provided above in conjunction with Claim 8. Therefore, Applicants request reconsideration and allowance of Claim 10, as well as Claims 11-13, which depend from Claim 10.

In addition to its dependence from allowable Claim 10, Claim 12 is also allowable since *Kung* does not disclose the additional limitations recited in this dependent claim. For example, Claim 12 recites “combining the registration information received from the second and third call managers by the first call manager to form the composite registration information stored by the first call manager.” With respect to this claim, the Office Action does not cite to any particular portion of *Kung*. Instead, the Office Action makes broad generalizations and assumptions that are not supported by the reference. Applicants respectfully submit that this is improper and contend that *Kung* does not disclose combining registration information from a number of different call managers since it doesn’t disclose a call manager that stores registration information about devices controlled by other call managers (as discussed above). For at least this additional reason, Claim 12 is allowable.

Claim 54 of the Application, as amended, recites the following limitations:

A method for device registration replication, comprising:
 providing a plurality of call managers in a packet-based network, each call manager controlling one or more devices coupled to the packet-based network and storing composite registration information associated with the devices;
 communicating status information from a first call manager to a second call manager in response to a change in which call manager of the plurality of call managers controls a device; and
 updating the composite registration information stored by the second call manager in response to receiving the status information.

Independent Claim 61 recites similar, although not identical, limitations.

Independent Claims 54 and 61 are allowable because *Kung* does not disclose, teach or suggest each and every one of these limitations. For example, *Kung* does not disclose “communicating status information from a first call manager to a second call manager in response to a change in which call manager of the plurality of call manager controls a device.” The Office Action asserts that this limitation is disclosed by a disclosure in *Kung* that a call manager determines that it needs resources for a call and communicates with other call managers requesting available resources for the call. Applicants fail to see how this disclosure relates in any way to a “change in which call manager of the plurality of call managers controls a device” or “communicating status information from a first call manager to a second call manager” in response to such a change. Although step 1315 discloses communications between call managers, there is no disclosure that such communications are in response to a change in which call manager of the plurality of call managers controls a device.

Furthermore, *Kung* does not disclose, teach or suggest “updating the composite registration information stored by the second call manager in response to receiving the status information.” For a teaching of this limitation, the Office Action cites to step 1327 of Figure 13 and the associated text. However, this step merely discloses that the conference server starts serving a caller in a conference call. The preceding step discloses sending the IP address of the conference server to a call manager server, but this is also not a disclosure of updating registration information and it clearly is not done in response to a change in which call manager controls a device.

For at least these reasons, Applicants respectfully submit that Claims 54 and 61 are in condition for allowance. Thus, Applicants request reconsideration and allowance of these independent claims, as well as the claims that depend from these independent claims.

Furthermore, the claims depending from Claims 54 and 61 are also allowable because *Kung* does not disclose the additional limitations recited in these claims. However, for the sake of brevity, Applicants will not argue those particular limitations here since they provide

additional details regarding the communicating and updating steps of Claim 54 (and corresponding limitations of Claim 61). Because these limitations of Claims 54 and 61 are not disclosed on *Kung* as discussed above, the further details of these limitations are also clearly not disclosed.

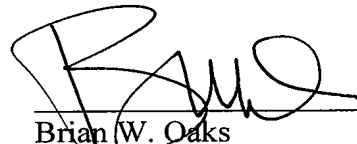
CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully requests full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Brian W. Oaks, Attorney for Applicants, at the Examiner's convenience at (214) 953-6986.

Although no fees are believed to be due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,
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Date: February 24 2009

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